

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

PFG VENTURES, L.P.,	)	CASE NO. 1:21-cv-02205-JPC
	)	
Plaintiff,	)	JUDGE J. PHILIP CALABRESE
	)	
v.	)	
	)	
BKEN, INC., ET AL.,	)	
	)	
Defendants.	)	
	)	
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PFG VENTURES, L.P.,	)	CASE NO. 1:22-cv-01177-JPC
	)	
Plaintiff,	)	JUDGE J. PHILIP CALABRESE
	)	
v.	)	
	)	
BRANDON C. KENNEDY, <i>ET AL.</i> ,	)	
	)	
Defendants.	)	
	)	

**JOINT STATUS REPORT**

Pursuant to the Court’s May 23, 2023 Proceeding Minutes, Plaintiff PFG Ventures, L.P. (“PFG”) and Defendants BKEN, Inc. d/b/a/ BrandCo Marketing, Brandon C. Kennedy, and Christina L. Kennedy (the “Kennedy Defendants”), and American Business Forms, Inc. d/b/a/ American Solutions for Business (“ASB”) submit this Joint Status Report in advance of the July 11, 2023 Status Conference.

Since the last status conference, PFG and the Kennedy Defendants have been working through the Kennedy Defendants’ payment of the disputed Account Acquisition Fee at issue in Case No. 1:21-cv-02205. PFG is in the process of compiling its invoices in support of its attorneys’ fees and costs related to its collection of the Account Acquisition Fee to provide to counsel for the Kennedy Defendants, and agrees to provide that information within 14 days.

Additionally, the Parties have been diligently reviewing and finalizing documents for production based on the agreed upon search terms. The Kennedy Defendants, in particular, have produced 481,233 pages of documents to date. The Parties agree to make additional document productions within two weeks and hope to substantially complete document productions and begin scheduling depositions in August.

The Parties propose the following dates for this matter:

Initial Expert Report(s) Due (for party that bears burden of proof on an issue):  
**November 1, 2023**

Rebuttal Expert Report(s) Due:  
**December 1, 2023**

Discovery Cut-off:  
**January 15, 2024**

Expert Discovery Cut-off:  
**January 15, 2024**

Dispositive Motion Deadline:  
**February 14, 2024**

Status Conference: \_\_\_\_\_

Respectfully submitted,

/s/ Ariana E. Bernard

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